

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

ANDREW L. COLBORN,

Plaintiff,

v.

Case No. 19-CV-484

NETFLIX, INC.,
CHROME MEDIA, LLC, f/k/a
SYNTHESIS FILMS, LLC,
LAURA RICCIARDI, and
MOIRA DEMOS,

Defendants.

AFFIDAVIT OF JOHN F. MAYER

STATE OF WISCONSIN)
) SS.
MANITOWOC COUNTY)

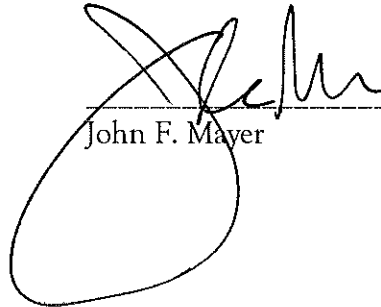
JOHN F. MAYER, being first duly sworn under oath, states as follows:

1. I am an attorney representing Michael Griesbach in relation to a subpoena dated February 9, 2022, for the production of documents which was served upon him by Netflix, Inc. in relation to the above-captioned matter.

2. On March 11, 2022, I met with counsel for Netflix, Inc. via telephonic conference regarding the subpoena pursuant to Fed. R. Civ. P. 26(f).

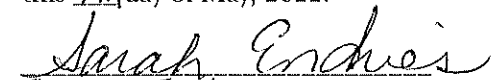
3. During the conference, I explained to Netflix that we were objecting to their request on the basis for a number of reasons including, but not limited to, that all the requested material is already in their possession, that the material is all publicly available, that their request was

unnecessarily burdensome, that what they are seeking is not discoverable as it is not relevant, and that Mr. Griesbach was entitled to protection under the reporter privilege.



John F. Mayer

Subscribed and sworn to before me
this 9th day of May, 2022.



Sarah Endries Notary Public
Manitowoc County, Wisconsin
My commission Expires: 9/3/23

